

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION AT MEMPHIS

ABDOUL BAH,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 2:12-cv-02396-STA-tmp
	)	
MILLSTONE MEDICAL OUTSOURCING,	)	
LLC	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Defendant Millstone Medical Outsourcing, LLC (“Millstone”), hereby moves for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. In support of its motion, Defendant relies upon the accompanying Memorandum of Law in Support of Motion for Summary Judgment and Local Rule 56.1 Statement of Material Undisputed Facts with attached exhibits.

DEFENDANT,  
Millstone Medical Outsourcing

By its attorneys,

NIXON PEABODY LLP

/s/ Neal J. McNamara  
Neal J. McNamara, *pro hac vice*  
One Citizens Plaza – 5<sup>th</sup> Floor  
Providence, RI 02903  
Tel. (401) 454-1000  
Fax. (401) 454-1030  
Email: [nmcnamara@nixonpeabody.com](mailto:nmcnamara@nixonpeabody.com)

BOURLAND, HEFLIN, ALVAREZ,  
MINOR & MATTHEWS, PLC

/s/ John J. Heflin III

John J. Heflin III (Tenn. Disc. No. 6142)

5400 Poplar Avenue, Suite 100

Memphis, Tennessee 38119

Tel: (901) 683-3526

Fax: (901) 763-1037

Email: [johnheflin@bhammlaw.com](mailto:johnheflin@bhammlaw.com)

Dated: May 17, 2013

Certificate of Service

The undersigned certifies that a copy of the foregoing document was served via the Court's ECF system upon the following counsel of record this 17<sup>th</sup> day of May, 2013:

Odell Horton, Jr.

Wyatt, Tarrant & Combs, LLP

1715 Aaron Brenner Drive, Suite 800

Memphis, TN 38120

/s/ Neal J. McNamara